

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

IN RE: NEW ENGLAND COMPOUNDING
PHARMACY, INC. PRODUCTS LIABILITY
LITIGATION

THIS DOCUMENT RELATES TO:
All Tennessee Actions Against The
St. Thomas Entities

MDL No. 2419
Master Docket No.: 1:13-md-2419-RWZ

Honorable Rya W. Zobel

DEMAND FOR JURY TRIAL

**PLAINTIFFS' STEERING COMMITTEE'S MOTION TO COMPEL THE ST.
THOMAS ENTITIES TO RESPOND TO CERTAIN INTERROGATORIES**

Plaintiffs' Steering Committee moves this Honorable Court, pursuant to Fed. Rule Civ. Pro. 37 and Local Rule 37.1, for an order compelling the St. Thomas Entities to respond to certain interrogatories. The St. Thomas Entities include St. Thomas Health, St. Thomas Hospital, and St. Thomas Network, and the interrogatory responses of those entities are attached as Exhibits 1-3 respectively of the contemporaneously filed Declaration of Benjamin A. Gastel.

For the reasons articulated in the accompanying memorandum of law in support of this Motion, the PSC respectfully requests that the Court compel the St. Thomas Entities to provide substantive responses to the following interrogatories:

- Saint Thomas Health Interrogatories 2, 3, 5, 7, 8, 10, 12, 15, and 17;
- Saint Thomas Hospital Interrogatories: 2, 4, 6, 8, 11, 12, 14, 17, and 23; and
- Saint Thomas Network Interrogatories: 5, 7, and 14.

November 19, 2014

Respectfully submitted,

/s/ J. Gerard Stranch, IV

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Plaintiffs' Steering Committee

LOCAL RULES 7.1 AND 37.1 STATEMENT

The undersigned hereby certifies that Plaintiffs' counsel have conferred with counsel for the Saint Thomas Entities and have attempted, in good faith, to resolve or narrow the issues raised by this Motion but were unable to do so. The undersigned further certifies that the PSC followed the provisions of Local Rule 37.1 prior to filing the instant motion as explained in greater detail in the contemporaneously filed memorandum of law in support of this motion.

/s/ J. Gerard Stranch, IV

J. Gerard Stranch, IV

CERTIFICATE OF SERVICE

I, J. Gerard Stranch, IV, hereby certify that I caused a copy of the foregoing to be filed electronically via the Court's electronic filing system. Those attorneys who are registered with the Court's electronic filing system may access these filings through the Court's system, and notice of these filings will be sent to these parties by operation of the Court's electronic filing system.

Dated: November 19, 2014

/s/ J. Gerard Stranch, IV

J. Gerard Stranch, IV